



1 KELLEY S. OLAH, (SBN 245180)  
kelley.olah@btlaw.com  
2 **BARNES & THORNBURG LLP**  
2029 Century Park East, Suite 300  
3 Los Angeles, California 90067  
Telephone: (310) 284-3880  
4 Facsimile: (310) 284-3894

5 Attorney for Defendant  
6 CAPITAL RESIN CORPORATION  
7

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

10  
11 **ATS PRODUCTS, INC.,**

12 **Plaintiff,**

13 **vs.**

14 **CHAMPION FIBERGLASS, INC.;**  
15 **FRANK GHIORSO; TG SOLUTIONS-**  
16 **GLOBAL, LLC; CAPITAL RESIN**  
17 **CORPORATION; LOUIS PILATO.**

18 **Defendants.**  
19

Case No. 3:13-cv-02403-SI

**STIPULATION TO EXTEND TIME TO  
RESPOND TO COMPLAINT (L.R. 6-1)**

Fourth Amended Complaint Served: July 16,  
2015

Current Response Date: September 3, 2015  
Agreed Response Date: September 24, 2015

20 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

21 Pursuant to Civil Local Rules 6-1(a), Defendant Capital Resin Corporation (hereinafter  
22 “Defendant”), and Plaintiff ATS Products, Inc. (hereinafter “Plaintiff”) hereby stipulate to  
23 Defendant’s request, for an extension of time for Defendant to file a response to Plaintiff’s Fourth  
24 Amended Complaint.

25 WHEREAS, Plaintiff’s Fourth Amended Complaint (the “FAC”) was filed on July 6,  
26 2015. Defendant was served on or about July 16, 2015,

27 WHEREAS, the last day for Defendant to respond to the FAC is September 3, 2015, by  
28 prior extension,

1 WHEREAS, Defendant and Plaintiff agree to extend the time for Defendant to respond to  
2 the FAC.

3 IT IS HEREBY STIPULATED by and between Defendant and Plaintiff, by and through  
4 their respective counsel, that Defendant Capital Resin Corporation will have until and including  
5 September 24, 2015 to file and serve their response to the FAC.

6  
7  
8 Dated: September 3, 2015

**SHEA & McINTYRE, A.P.C.**

9 By /s/ Marc Shea

10 Marc Shea

11 Kevin Elliot

Attorney for Plaintiff ATS PRODUCTS, INC.

12 Dated: September 3, 2015

**BARNES & THORNBURG LLP**

13  
14 By /s/ Kelley S. Olah

Kelley S. Olah

15 Attorney for Defendant

16 CAPITAL RESIN CORPRATION

17  
18 **Attestation Pursuant to Civil Local Rule 5.1(i)**

19 Pursuant to Civil Local Rule 5.1(i), I, Kelley Olah, hereby attest that I have obtained  
20 concurrence in the filing of this document from the other signatories to this document.

21 I declare under penalty of perjury under the law of the United States of America that the  
22 foregoing is true and correct. Executed on September 3, 2015 at Los Angeles, California.

23  
24 /s/ Kelley S. Olah

Kelley S. Olah